

UNITED STATES DISTRICT COURT
DISTRICT OF MAINE

BARBARA A. MCINTYRE,)	
)	
Plaintiff)	
)	Civil Docket No.: 1:14-cv-00083-JCN
v.)	
)	
AFFILIATED LABORATORY, INC., et al.,))	
)	
Defendants)	

PLAINTIFF'S THIRD SUPPLEMENTAL PROPOSED JURY INSTRUCTIONS

NOW COMES the Plaintiff, Barbara McIntyre, by and through her attorneys, Gilbert & Greif, P.A., and submits the following supplemental proposed jury instructions.

Dated at Bangor, Maine this 12th day of January, 2016

/s/ Julie D. Farr

Erik M. P. Black, Esq.

Arthur J. Greif, Esq.

Julie D. Farr, Esq.

GILBERT & GREIF, P.A.

P.O. Box 2339

82 Columbia Street

Bangor, ME 04402-2339

Attorneys for Plaintiff

PLAINTIFF'S PROPOSED JURY INSTRUCTION NO. 12

INTERPLAY BETWEEN SSDI AND ADA

The pursuit and receipt of Social Security disability benefits does not bar the recipient from pursuing an ADA claim of employment discrimination. Social Security Disability and ADA claims do not inherently conflict. The Social Security Administration does not consider whether a claimant, with reasonable accommodation, could perform the essential functions of her job.

Cleveland v. Policy Management Systems Corp., 526 U.S.795 (1999)

CERTIFICATE OF SERVICE

I, Julie D. Farr, Esq., attorney for Plaintiff, hereby certify that on this date I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing(s) to all registered participants.

Dated: January 12, 2016

/s/ Julie D. Farr

Julie D. Farr, Esq.

Attorney for Plaintiff